AO 91 (Rev. 11/11) Criminal Complaint United States District Court **United States Courts** Southern District of Texas for the **FILED** Southern District of Texas June 28, 2025 Nathan Ochsner, Clerk of Court United States of America Case No. 7:25-mj-01506-1 Yu Feng ZHANG (China / 1974) Defendant(s) CRIMINAL COMPLAINT I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Hidalgo June 27, 2025 in the county of in the On or about the date(s) of _ Southern District of Texas , the defendant(s) violated: Offense Description Code Section Fraud and misuse of visas 18 USC 1546(a) This criminal complaint is based on these facts: See Attachment A Continued on the attached sheet. Approved by AUSA D. Walker Jordan Green

Submitted by reliable electronic means, sworn to and attested telephonically per FED.R.CR.4.1, and probable

Date: June 28, 2025 at 11:47 p.m.

cause found on:

City and state: McAllen, Texas

Complainant's signature

Jordan Green, SA - Homeland Security Investigations

Printed name and title

Judge's signature

J. Scott Hacker, United States Magistrate Judge

Printed name and title

ATTACHMENT A

- On June 27, 2025, Homeland Security Investigations (HSI) Special Agents and Texas 1. Department of Public Safety (DPS) Troopers conducted a traffic stop on a vehicle in McAllen, Texas. At the time of the stop, the vehicle contained eight (8) passengers, including Yu Feng ZHANG.
- 2. ZHANG is a citizen and national of China.
- 3. When asked for identification documents, ZHANG stated he did not have identification documents in his possession, but stated he was in the United States legally with a B2 Tourist Visa. ZHANG stated his physical B2 Tourist Visa was at his house. Subsequent immigration database queries established ZHANG applied for a B2 Tourist Visa on November 04, 2024, and was issued the non-immigrant visa on November 06, 2024.
- During a subsequent interview, ZHANG made the following statements: 4.
 - a. ZHANG stated he had initially applied for the B2 Tourist Visa at a U.S. Embassy in China.
 - b. ZHANG stated he learned how to apply for a B2 Tourist Visa from the internet.
 - c. ZHANG stated he came to the U.S. to apply for asylum and not for tourist activities.
 - d. ZHANG stated he lied to the U.S. Embassy when he initially applied for the B2 Tourist Visa because he knew he would not be issued a visa if he stated his intentions were to apply for asylum once in the U.S.
- 5. Therefore, at the time of the traffic stop, ZHANG uttered and/or attempted to use a B2 Tourist Visa as a means of identifying his legal status in the United States and knew he had procured the B2 Tourist Visa by means of fraud or false statements.